



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 1, 2022

By ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007B

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (VSB)

Dear Judge Broderick:

The Government respectfully submits this letter in opposition to the defendant's April 1, 2022 letter, which requests a stay of this matter based on a Paramount Plus trailer. The Court should reject the defendant's application, which is premised on the pure speculation that an unreleased interview with Juror 50 could potentially contain information relevant to the defendant's motion.

The Court has conducted a thorough hearing, at which the Court asked Juror 50 detailed questions about all subjects relevant to the pending motion. The Court has completed the fact-finding process, and there is no basis on the current record to conclude that a stay is warranted. Indeed, the defendant's application contains no legal or factual support beyond the citation to a Paramount Plus trailer. If the defendant obtains new information, she may file any appropriate

motions at that time, but it is inappropriate to stay this matter based on nothing more than the defendant's conjecture.

The Government strongly opposes a stay of this matter. The application should be denied.

Respectfully submitted,

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Cc: Defense Counsel (by ECF)